UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STEVE ALLEN,

                                        Plaintiffs,

           -against-

THE CITY OF NEW YORK, P.O. HEATHER VOBIS,
Shield No. 8755, and P.O. John Doe,

                                     Defendants.

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NOTICE OF MOTION FOR SUMMARY JUDGMENT LIMITED TO THE ISSUE OF QUALIFIED IMMUNITY

15 CV 6657 (CM) (RLE)

       PLEASE TAKE NOTICE that the undersigned will move this Court, before the Honorable Colleen McMahon, at the United States Courthouse for the Southern District of New York, located at 500 Pearl St., New York, NY, on a date to be determined by the Court, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, limited at this time to the issue of qualified immunity, dismissing plaintiff's complaint against defendants City of New York and Police Officer Heather Vobis, with prejudice, and for such other and further relief as the Court may deem just and proper.

       PLEASE TAKE FURTHER NOTICE that pursuant to the individual practice rules of the Honorable Colleen McMahon, discovery in this matter is stayed, except for plaintiff's depositions, which will take place in the next 30 days.

       PLEASE TAKE FURTHER NOTICE that pursuant to the individual practice rules of the Honorable Colleen McMahon, defendants' briefs and papers addressing the issue of qualified immunity shall be served and filed by March 31, 2016.

PLEASE TAKE FURTHER NOTICE that pursuant to the individual practice rules of the Honorable Colleen McMahon, plaintiffs' opposition papers shall be served and filed by April 14, 2016.

PLEASE TAKE FURTHER NOTICE that pursuant to the individual practice rules of the Honorable Colleen McMahon, defendants' reply papers shall be served and filed by April 28, 2016.

Dated: New York, New York
            March 1, 2016

                                  ZACHARY W. CARTER
                                  Corporation Counsel of the
                                  City of New York
                                  Attorney for Defendants City and Vobis
                                  100 Church Street
                                  New York, New York 10007
                                  (212) 356-2656

                          By: _____
                                  Paul H. Johnson
                                  Assistant Corporation Counsel
                                  Special Federal Litigation Division

To: VIA ECF
        Jessica Massimi, Esp. (via ECF)
        Attorney for Plaintiff